



Indiana Department of Environmental Management  
Office of Air Management  
Rule Fact Sheet  
December 6, 2000

**National Emission Standards for Hazardous Air Pollutants for  
Shipbuilding and Ship Repair Operations  
LSA Document #00-69**

**Overview**

Amends volatile organic compound (VOC) rules and incorporates federal National Emission Standards for Hazardous Air Pollutants (NESHAP) rules concerning shipbuilding and ship repair.

**Citations Affected**

Amends 326 IAC 8-12, Shipbuilding and Ship Repair Operations in Clark, Floyd, Lake and Porter counties  
Adds 326 IAC 20-26, Shipbuilding and Ship Repair Surface Coating Operations

**Affected Persons**

Jeffboat, LLC located in Clark County.

**Potential Cost**

No additional cost to the affected source. Cost savings possible by eliminating duplicative reporting.

**Outreach**

A meeting was held with the affected source to discuss comments made at the First Notice of Comment Period.

**Description**

This rule making incorporates the emission limits and standards of 40 CFR 63, Subpart II, National Emission Standard for Hazardous Air

Pollutants (NESHAP) for Shipbuilding and Ship Repair Operations and makes certain changes to Indiana's existing rule regulating VOC emissions from this source category. IDEM has a second rule making in process, LSA Document #000-44, the Sunset Reauthorization rule as required by IC 13-14-9.5. In this rule making, 326 IAC 8-12 was commented upon, causing an overlap in these two rule processes. IDEM has moved the comments from the sunset rule and has responded to the comment in this rule making.

This NESHAP applies to each new and existing shipbuilding and ship repair surface coating operation located at facilities that are major sources of hazardous air pollutants (HAP). Major sources of HAPs are also subject to IDEM's Title V operating permit program.

IDEM has identified one source in Clark County, Jeffboat LLC, as being subject to the NESHAP. Jeffboat is also subject to 326 IAC 8-12, VOC rule for ship building and ship repair. In an effort to streamline some of the overlapping requirements identified by the source between the HAP and VOC rules, IDEM proposes that the source meet the more stringent of the two rules.

In response to a request from Jeffboat to increase operational flexibility, IDEM proposes to increase the quantity of any single exempt

coating allowed by 326 IAC 8-12-2 from twenty gallons per year to twenty-five gallons per year. This amount is less than the fifty-two gallons allowed by the NESHAP. To assure that air quality is not compromised, IDEM is also proposing to reduce the total annual amount of all exempt coatings to less than two hundred sixty-four gallons instead of the four hundred gallons allowed in the state rule. This will result in a decrease of the total amount of all exempt coatings used on an annual basis. This will assure that overall VOC emissions will remain at the same level or decrease.

action can be obtained by calling (800) 451-6027 (in Indiana), press 0 and ask for Suzanne Whitmer, Rule Development Section, Office of Air Management, (or extension 2-8229 or dial (317) 232-8229. Technical information can be obtained by calling Pat Daniel, Program Planning and Policy Section at extension 3-0429 or 317-233-0429.

### **Consideration of Factors Outlined in Indiana Code 13-14-8-4**

Indiana Code 13-14-8-4 requires that in adopting rules and establishing standards, the board shall take into account the following:

- 1) All existing physical conditions and the character of the area affected.
- 2) Past, present, and probable future uses of the area, including the character of the uses of surrounding areas.
- 3) Zoning classifications.
- 4) The nature of the existing air quality or existing water quality, as appropriate.
- 5) Technical feasibility, including the quality conditions that could be reasonably be achieved through coordinated control of all factors affecting the quality.
- 6) Economic reasonableness of measuring or reducing any particular type of pollution.
- 7) The right of all persons to an environment sufficiently uncontaminated as not to be injurious to:
  - (A) human, plant animal, or aquatic life; or
  - (B) the reasonable enjoyment of life and property.

### **Consistency with Federal Requirements**

The new and amended rules are consistent with federal rules and guidance.

### **IDEM Contact**

Additional information regarding this rulemaking